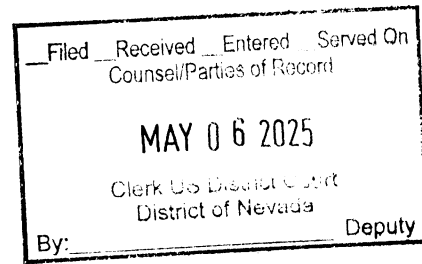


1 Tyler Baehr, Pro Se  
2 9752 Pachuca Drive  
3 Reno, Nevada 89521  
4  
5  
6



7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 ERICA BLUTH, an individual, and  
10 LAVORIA WILSON, an individual,

Case No.: 3:25-cv-00129-ART-CSD

11 Plaintiffs,

**ANSWER TO COMPLAINT**

12 vs.

13 TYLER BAEHR, an individual, and THE  
14 CITY OF RENO, a political subdivision of  
the State of Nevada,

15 Defendants. /

16 Defendant, Tyler Baehr, appearing pro se, hereby responds, on his behalf only, to the  
17 allegations in Plaintiff's Complaint for Damages and Declaratory Relief [ECF No. 1], filed  
18 on March 5, 2025, by admitting, denying, and averring as set forth below. The defendant  
19 asserts that he is subject to a pending criminal action and responding to certain allegations  
20 herein could tend to incriminate him in that action. Therefore, the defendant invokes the  
21 Fifth Amendment to the United States and Nevada Constitutions which protect an individual  
22 against self-incrimination. Matters not fully responded to herein are the result of the  
23 invocation of the defendant's Fifth Amendment rights.  
24

**Jurisdiction**

25 1. In answering paragraph 1 of the Complaint, said paragraph states legal  
26 conclusions to which no response is required. Therefore, the defendant denies the same.  
27

28 2. In answering paragraph 2 of the Complaint, said paragraph states legal  
conclusions to which no response is required. Therefore, the defendant denies the same.

1           3.     In answering paragraph 3 of the Complaint, said paragraph states legal  
2 conclusions to which no response is required. Therefore, the defendant denies the same.

3                               **Venue**

4           4.     In answering paragraph 4 of the Complaint, said paragraph states legal  
5 conclusions to which no response is required. Therefore, the defendant denies the same.

6                               **Parties**

7           5.     Defendant is without knowledge or information sufficient to form a belief as  
8 to the truth of the averments contained in Paragraph 5 of plaintiffs' Complaint and therefore  
9 denies the same.

10          6.     Defendant is without knowledge or information sufficient to form a belief as  
11 to the truth of the averments contained in Paragraph 6 of plaintiffs' Complaint and therefore  
12 denies the same.

13          7.     Paragraph 7 of the Complaint seeks information that could tend to incriminate  
14 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
15 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
16 said paragraph.

17          8.     In answering paragraph 8 of the Complaint, said paragraph states legal  
18 conclusions to which no response is required. Therefore, the defendant denies the same.

19          9.     In answering paragraph 9 of the Complaint, said paragraph states legal  
20 conclusions to which no response is required. Therefore, the defendant denies the same.

21          10.    In answering paragraph 10 of the Complaint, said paragraph states legal  
22 conclusions to which no response is required. Therefore, the defendant denies the same.

23          11.    Defendant is without knowledge or information sufficient to form a belief as  
24 to the truth of the averments contained in Paragraph 11 of plaintiffs' Complaint and therefore  
25 denies the same.

26          12.    Defendant is without knowledge or information sufficient to form a belief as  
27 to the truth of the averments contained in Paragraph 12 of plaintiffs' Complaint and therefore  
28 denies the same.

**Statement of Facts - Bluth Incident**

13. Paragraph 13 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

14. Paragraph 14 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

15. Paragraph 15 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

16. Paragraph 16 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

17. Paragraph 17 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

18. Paragraph 18 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

**Statement of Facts - Wilson Incident**

19. Paragraph 19 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment

1 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
2 said paragraph.

3 20. Paragraph 20 of the Complaint seeks information that could tend to incriminate  
4 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
5 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
6 said paragraph.

7 21. Paragraph 21 of the Complaint seeks information that could tend to incriminate  
8 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
9 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
10 said paragraph.

11 22. Paragraph 22 of the Complaint seeks information that could tend to incriminate  
12 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
13 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
14 said paragraph.

15 23. Paragraph 23 of the Complaint seeks information that could tend to incriminate  
16 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
17 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
18 said paragraph.

19 24. Paragraph 24 of the Complaint seeks information that could tend to incriminate  
20 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
21 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
22 said paragraph.

23 25. Paragraph 25 of the Complaint seeks information that could tend to incriminate  
24 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
25 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
26 said paragraph.

27 26. Paragraph 26 of the Complaint seeks information that could tend to incriminate  
28 this answering defendant and therefore he invokes the protections of the Fifth Amendment

1 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
2 said paragraph.

3 27. Paragraph 27 of the Complaint seeks information that could tend to incriminate  
4 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
5 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
6 said paragraph.

7 **First Cause of Action**

8 **Violation of Fourth Amendment Rights Under 42 U.S.C. § 1983**

9 28. Defendant adopts by reference and incorporates herein each, every and all of  
10 his admissions, denials and averments to Paragraphs 1 through 27 of plaintiffs' Complaint  
11 as if the same were set forth in full at this point.

12 29. Paragraph 29 of the Complaint seeks information that could tend to incriminate  
13 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
14 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
15 said paragraph.

16 30. Paragraph 30 of the Complaint seeks information that could tend to incriminate  
17 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
18 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
19 said paragraph.

20 31. Paragraph 31 of the Complaint seeks information that could tend to incriminate  
21 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
22 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
23 said paragraph.

24 32. Paragraph 32 of the Complaint seeks information that could tend to incriminate  
25 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
26 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
27 said paragraph.

28 33. Paragraph 33 of the Complaint seeks information that could tend to incriminate

1 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
2 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
3 said paragraph.

4 34. Paragraph 34 of the Complaint seeks information that could tend to incriminate  
5 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
6 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
7 said paragraph.

8 35. Paragraph 35 of the Complaint seeks information that could tend to incriminate  
9 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
10 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
11 said paragraph.

12 36. Paragraph 36 of the Complaint seeks information that could tend to incriminate  
13 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
14 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
15 said paragraph.

16 **Second Cause of Action**

17 **Violation of Nevada Constitution Article 1, Section 18**

18 **(Against Baehr and the City of Reno)**

19 37. Defendant adopts by reference and incorporates herein each, every and all of  
20 his admissions, denials and averments to Paragraphs 1 through 36 of plaintiffs' Complaint  
21 as if the same were set forth in full at this point.

22 38. In answering paragraph 38 of the Complaint, said paragraph states legal  
23 conclusions to which no response is required. Therefore, the defendant denies the same.

24 39. Paragraph 39 of the Complaint seeks information that could tend to incriminate  
25 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
26 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
27 said paragraph.

28 40. Paragraph 40 of the Complaint seeks information that could tend to incriminate

1 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
2 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
3 said paragraph.

4 **Third Cause of Action**

5 **Intrusion Upon Seclusion**

6 **(Against Baehr and the City of Reno)**

7 41. Defendant adopts by reference and incorporates herein each, every and all of  
8 his admissions, denials and averments to Paragraphs 1 through 40 of plaintiffs' Complaint  
9 as if the same were set forth in full at this point.

10 42. Paragraph 42 of the Complaint seeks information that could tend to incriminate  
11 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
12 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
13 said paragraph.

14 43. Paragraph 43 of the Complaint seeks information that could tend to incriminate  
15 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
16 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
17 said paragraph.

18 44. Paragraph 44 of the Complaint seeks information that could tend to incriminate  
19 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
20 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
21 said paragraph.

22 45. In answering paragraph 45 of the Complaint, said paragraph states legal  
23 conclusions to which no response is required. Therefore, the defendant denies the same.

24 46. Paragraph 46 of the Complaint seeks information that could tend to incriminate  
25 this answering defendant and therefore he invokes the protections of the Fifth Amendment  
26 to the United States and Nevada Constitutions, and based thereupon denies all allegations of  
27 said paragraph.

28 ///



**Fourth Cause of Action**

**42 U.S.C. 1983 - Monell Claim for Failure to Train**

**(Against the City of Reno)**

47. Defendant adopts by reference and incorporates herein each, every and all of his admissions, denials and averments to Paragraphs 1 through 46 of plaintiffs' Complaint as if the same were set forth in full at this point.

48. Paragraph 48 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

49. In answering paragraph 49 of the Complaint, said paragraph states legal conclusions to which no response is required. Therefore, the defendant denies the same.

50. Paragraph 50 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

51. Paragraph 51 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

52. Paragraph 52 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.

53. Paragraph 53 of the Complaint seeks information that could tend to incriminate this answering defendant and therefore he invokes the protections of the Fifth Amendment to the United States and Nevada Constitutions, and based thereupon denies all allegations of said paragraph.





**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am a defendant in the foregoing matter, and that on this day I served a copy of on the foregoing document(s) on the party(s) set forth below by:

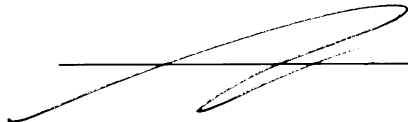
- ☒ U.S. Mail
- ☐ CMECF electronic service
- ☐ Facsimile Transmission
- ☐ Personal Service
- ☐ Messenger Service

addressed as follows:  
Luke Busby, Esq.  
316 California Ave.  
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Lauren Gorman, Esq.  
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Karl S. Hall, Esq., Reno City Attorney  
Peter K. Keegan, Esq., Deputy City Attorney  
Post Office Box 1900  
Reno, Nevada 89505  
Attorneys for the City of Reno

DATED this 6<sup>TH</sup> day of MAY, 2025.

  
A handwritten signature in black ink, consisting of a stylized, cursive 'S' or 'Z' shape, is written over a horizontal line.